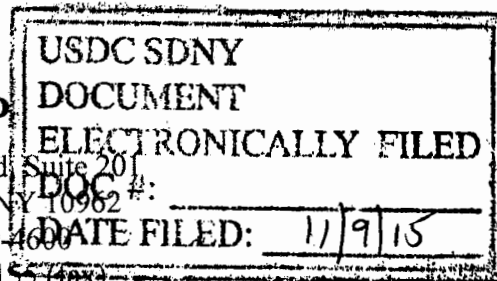


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October 30, 2015

VIA ECF

Honorable Sidney H. Stein
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan
U.S. Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

RE: Goldhaber Research Associates, LLC v. Tommy Jack, P.C. d/b/a The Jacks Law Firm, et al., In the USDC of the Southern District of New York, Civil Action No: 06 CV- 13628 (SHS)

Dear Judge Stein:

We are counsel for plaintiff and judgment creditor Goldhaber Research Associates, LLC in this action. We are in receipt of the Court's order of October 20, 2015 denying our request to file an amended complaint in this action against third party Tommy Jacks.

The stipulated judgment submitted by the parties and entered by the Court on January 20, 2015 states in Paragraph 7 that "This Court shall retain jurisdiction over the enforcement of this judgment." Docket Entry No. 33. We submit that the proposed amended complaint is part of the enforcement of the judgment pursuant to Rule 69(a). We respectfully request that the Court reconsider Plaintiff and Judgment Creditor Goldhaber Research Associates, LLC's request for leave to file the amended complaint.

Thank you for your consideration of this request.

Respectfully submitted,

Michael D. Steger

cc: Moshe Horn, Esq. (VIA ECF)
Steven S. Krane, Esq. (VIA ECF)

11/9/15 Motion for reconsideration of Oct. 20, 2015 order denied. Plaintiff has presented no new facts or law on this motion. SO ORDERED

SIDNEY H. STEIN
U.S.D.J.